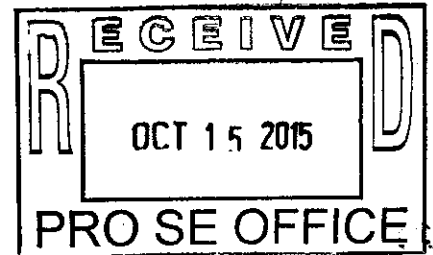


CIVIL RIGHTS COMPLAINT  
42 U.S.C. § 1983

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



Robert Anton Williams Jr 141-13-05027  
Full name of plaintiff/prisoner ID#

Plaintiff,

**COGAN, J.**

JURY DEMAND  
YES ☒ NO ☐

☒ ORIGINAL

-against-

- ① The New York State Board of Examiners of Sex Offenders
- ② The City of New York
- ③ The State of New York

Enter full names of defendants

[Make sure those listed above are  
identical to those listed in Part III.]

④ Steve Whitbeck chairman of the board of sex  
offenders

Defendants.

⑤ The State of New York Division of  
Criminal Justice Services

I. Previous Lawsuits:

**CV 15-6086**

- A. Have you begun other lawsuits in state or federal court  
dealing with the same facts involved in this action or  
otherwise relating to your imprisonment? Yes ( ) No ( ☒ )
- B. If your answer to A is yes, describe each lawsuit in the space below  
(If there is more than one lawsuit, describe the additional lawsuits  
on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs.

Robert Anton Williams Jr

Defendants:

Steve Whitbeck

2. Court (if federal court, name the district;  
if state court, name the county)

Eastern District of New York

3. Docket Number:

14 Civ 6794 (BMC)(LB)

4. Name of the Judge to whom case was assigned: Brian M. Cogan
5. Disposition: (for example: Was the case dismissed? Was it appealed? Is it still pending?)  
Dismissed
6. Approximate date of filing lawsuit: November 2014
7. Approximate date of disposition: September 2015

II. Place of Present Confinement: Rikers Island

A. Is there a prisoner grievance procedure in this institution? Yes ( ☒ ) No ( )

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? Yes ( ) No ( ☒ )

C. If your answer is YES,

1. What steps did you take? \_\_\_\_\_

2. What was the result? \_\_\_\_\_

D. If your answer is NO, explain why not Not applicable

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes ( ) No ( )

F. If your answer is YES,

1. What steps did you take? \_\_\_\_\_

2. What was the result? \_\_\_\_\_

III. Parties:

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Robert Anton Williams Jr  
Address 18-18 Hazen Street East Elmhurst, NY 11370

(In item B below, place the full name and address of each defendant)

B. List all defendants' names and the addresses at which each defendant may be served. Plaintiff must provide the address for each defendant named.

Defendant No. 1

The New York State Board of  
Examiners of Sex Offenders

Defendant No. 2

The City of New York

Defendant No. 3

The State of New York

Defendant No. 4

Steve Whitbeck (Chairman  
of the board of sex offenders)

Defendant No. 5

State of New York Division  
of Criminal Justice Services  
80 South Swan St  
Albany, NY 12210

[Make sure that the defendants listed above are identical to those listed in the caption on page 1].

IV. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 1/2 by 11 sheets of paper as necessary.)

- ① Erroneously charged and listed with a felony conviction without due process of law by all defendants
- ② Erroneously given high and inaccurate risk level determination by Steve Whitbeck and the board of Examiners without due process of law
- ③ Steve Whitbeck and the board erroneously notified the Department of Criminal Justice Services of a false felony conviction as well as false risk level assessment without due process of law

I have no idea when this happened and only gradually became aware of these claims  
(see additional sheet)

IV.A If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

Limited life opportunities

Emotional Distress

Depression

Harassment

Discrimination in housing & Employment

Fear and Paranoia from threats

Life & liberty interest severely altered

Mental Anguish

Defamation of Character.

## Statement of Claim (Additional Sheet)

I want to bring a Monell claim pursuant to *Monell v. the Department of Social Services of the City of New York* 436 U.S. 658, 692 (1978) against:

- ① The New York State Board of Examiners of Sex offenders the erroneous charge and listing of a criminal felony conviction and the subsequent notification to the State of New York Division of Criminal Justice Services was a policy, custom and or practice practically had the force of law and directly resulted in the injuries I suffered; the board had personal involvement with this injury.
- ② The City of New York, The State of New York and it's agencies involved allowed, supported and encouraged these aforementioned transgressions with personal knowledge of the absence of due process of law. The erroneous felony conviction, charge and listing was a policy, custom and or practice of the City and State of New York and practically had the force of law and directly resulted in the injuries I suffered.

(Additional claim sheet 2)

- ③ The State of New York Division of Criminal Justice Services erroneously charged and or listed me with a felony conviction without due process of law. The Division had personal involvement with the official policy, custom and or practice that practically had the force of law and directly resulted in my personal injuries

V. Relief:

State what relief you are seeking if you prevail on your complaint.

Financial Compensation of \$20,000,000.

I declare under penalty of perjury that on 9/5/15, I delivered this  
(Date)  
complaint to prison authorities to be mailed to the United States District Court for the Eastern  
District of New York.

Signed this 5<sup>th</sup> day of September, 2015. I declare under penalty of  
perjury that the foregoing is true and correct.



Signature of Plaintiff

Anna M. Kross Center

Name of Prison Facility

18-18 Hazen Street  
East Elmhurst, Ny 11370

Address

141-13-05027

Prisoner ID#

4. Amount of money that I have in cash or in a checking or savings account: \$ 100.00

5. Any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value that I own, including any item of value held in someone else's name (describe the property and its approximate value):

None

6. Any housing, transportation, utilities, or loan payments, or other regular monthly expenses (describe and provide the amount of the monthly expense):

None

7. Names (or, if under 18, initials only) of all persons who are dependent on me for support, my relationship with each person, and how much I contribute to their support:

NMD	Father	whatever I can
M A P	Father	whatever I can
A W M	Father	whatever I can

8. Any debts or financial obligations (describe the amounts owed and to whom they are payable):

- Over \$100,000 in student loan debts
- 3 young children to support

Declaration: I declare under penalty of perjury that the above information is true and understand that a false statement may result in a dismissal of my claims.

Date:

9/5/15

Robert Williams

Applicant's signature

Robert Williams

Printed name